

[Submitting Counsel on Signature Page]

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

*IN RE: SOCIAL MEDIA ADOLESCENT
ADDICTION/PERSONAL INJURY
PRODUCTS LIABILITY LITIGATION.*

MDL No. 3047
Case No. 4:22-md-03047-YGR

This Document Relates To:

ALL ACTIONS

**TEMPORARY SEALING MOTION RE:
PLAINTIFFS' OPPOSITION TO
DEFENDANTS' MOTION TO EXCLUDE
PLAINTIFFS' EXPERTS' GENERAL
CAUSATION OPINIONS FOR FAILURE
TO ACCOUNT FOR SECTION 230 AND
THE FIRST AMENDMENT**

Judge: Hon. Yvonne Gonzalez Rogers

Magistrate Judge: Hon. Peter H. Kang

Pursuant the Court's Order Setting Sealing Procedures (ECF No. 341), Plaintiffs submit this Temporary Sealing Motion regarding Plaintiffs' Opposition to Defendants' Motion to Exclude Plaintiffs' Experts' General Causation Opinions for Failure to Account for Section 230 and the First Amendment. Pursuant to that Order, the reasons for sealing (if any) will be addressed in a forthcoming omnibus stipulation or omnibus motion.

Docket No.	Document	Whether document contains a Party's Confidential Information
ECF No. 2409-1	Plaintiffs' Opposition to Defendants' Motion to Exclude Plaintiffs' Experts' General Causation Opinions for Failure to Account for Section 230 and the First Amendment (Sealed)	Temporarily filing under seal because document contains information that the parties may consider to be confidential
ECF No. 2409-2	Plaintiffs' Opposition to Defendants' Motion to Exclude Plaintiffs' Experts' General Causation Opinions for Failure to Account for Section 230 and the First Amendment (Redacted)	Temporarily filing under seal because document contains information that the parties may consider to be confidential
ECF No. 2409-3	Declaration of Andre M. Mura	Not redacted or sealed
ECF No. 2409-4	Ex. 1, May 16, 2025 Trial Report of Mitch Prinstein, Ph.D.	Temporarily filing under seal because document contains information that the parties may consider to be confidential
ECF No. 2409-5	Ex. 2, June 13, 2025 Expert Report of Dr. Emilio Ferrara	Temporarily filing under seal because document contains information that the parties may consider to be confidential
ECF No. 2409-6	Ex. 3, June 13, 2025 Expert Report of Dr. Chris Mattmann	Temporarily filing under seal because document contains information that the parties may consider to be confidential
ECF No. 2409-7	Ex. 4, July 9, 2025 Expert Report of Sandeep Chatterjee, Ph.D.	Temporarily filing under seal because document contains information that the parties

1		may consider to be confidential
2	ECF No. 2409-8	Ex. 5, July 9, 2025 Expert Report of Michael Baiocchi, Ph.D.
3	ECF No. 2409-9	Ex. 6, April 18, 2025 Expert Report of Dr. Randy Auerbach
4	ECF No. 2409-10	Ex. 7, Exhibit 25 to the Deposition of Brian Boland
5		Temporarily filing under seal because document contains information that the parties may consider to be confidential
6		Temporarily filing under seal because document contains information that the parties may consider to be confidential
7		Not redacted or sealed
8		
9		
10		
11		
12		
13		
14		
15		
16		
17		
18		
19		
20		
21		
22		
23		
24		
25		
26		
27		
28		

1 DATED: November 7, 2025

2 Respectfully submitted,

3
4 /s/ Lexi J. Hazan
5 LEXI J. HAZAM
6 **LIEFF CABRASER HEIMANN &**
7 **BERNSTEIN, LLP**
8 275 BATTERY STREET, 29TH FLOOR
9 SAN FRANCISCO, CA 94111-3339
10 Telephone: 415-956-1000
11 lhazam@lchb.com

12 PREVIN WARREN
13 **MOTLEY RICE LLC**
14 401 9th Street NW Suite 630
15 Washington DC 20004
16 T: 202-386-9610
17 pwarren@motleyrice.com

18 Co-Lead Counsel

19 ANDRE M. MURA
20 **GIBBS MURA LLP**
21 1111 Broadway, Suite 2100
22 Oakland, CA 94607
23 Telephone: (510) 350-9700
24 Facsimile: (510) 350-9701
25 amm@classlawgroup.com

26 Plaintiffs Steering Committee Leadership

27
28 *Attorneys for PI/SD Plaintiffs*

1 **KRIS MAYES**
2 Attorney General
3 State of Arizona

4 */s/ Reagan Healey*
5 Reagan Healey (AZ No. 038733), *pro hac vice*
6 Assistant Attorney General
7 Arizona Attorney General's Office
8 2005 North Central Avenue
9 Phoenix, AZ 85004
10 Phone: (602) 542-3725
11 Fax: (602) 542-4377
12 Reagan.Healey@azag.gov

13 *Attorney for Plaintiff State of Arizona*

14 **ROB BONTA**
15 Attorney General
16 State of California

17 */s/ Megan O'Neill*
18 Nicklas A. Akers (CA SBN 211222)
19 Senior Assistant Attorney General
20 Bernard Eskandari (SBN 244395)
21 Emily Kalanithi (SBN 256972)
22 Supervising Deputy Attorneys General
23 Nayha Arora (CA SBN 350467)
24 David Beglin (CA SBN 356401)
25 Megan O'Neill (CA SBN 343535)
26 Joshua Olszewski-Jubelirer (CA SBN 336428)
27 Marissa Roy (CA SBN 318773)
28 Brendan Ruddy (CA SBN 297896)
 Deputy Attorneys General
 California Department of Justice
 Office of the Attorney General
 455 Golden Gate Ave., Suite 11000
 San Francisco, CA 94102-7004
 Phone: (415) 510-4400
 Fax: (415) 703-5480
 Megan.ONeill@doj.ca.gov

26 *Attorneys for Plaintiff the People of the State of*
27 *California*

28 **PHILIP J. WEISER**

1 Attorney General
2 State of Colorado

3 /s/ Krista Batchelder

4 Krista Batchelder, (CO Reg.45066), *pro hac vice*
5 Deputy Solicitor General
6 Shannon Stevenson (CO Reg. 35542), *pro hac vice*
7 Solicitor General
8 Elizabeth Orem (CO Reg. 58309), *pro hac vice*
9 Assistant Attorney General
10 Colorado Department of Law
11 Ralph L. Carr Judicial Center
12 Consumer Protection Section
13 1300 Broadway, 7th Floor
14 Denver, CO 80203
15 Phone: (720) 508-6384
16 krista.batchelder@coag.gov
17 Shannon.stevenson@coag.gov
18 Elizabeth.orem@coag.gov

19 *Attorneys for Plaintiff State of Colorado, ex rel.*
20 *Philip J. Weiser, Attorney General*

21 **WILLIAM TONG**

22 Attorney General
23 State of Connecticut

24 /s/ Rebecca Borné

25 Rebecca Borné
26 (CT Juris No. 446982), *pro hac vice*
27 Tess E. Schneider
28 (CT Juris No. 444175), *pro hac vice*
Krislyn M. Launer
(CT Juris No. 440789), *pro hac vice*
Assistant Attorneys General
Connecticut Office of the Attorney General
165 Capitol Avenue
Hartford, Connecticut 06106
Phone: 860-808-5306
Fax: 860-808-5593
Rebecca.Borne@ct.gov
Tess.Schneider@ct.gov
Krislyn.Launer@ct.gov

29 *Attorneys for Plaintiff State of Connecticut*

1
2 **KATHLEEN JENNINGS**
3 Attorney General
4 State of Delaware

5 */s/ Ryan Costa*
6 Marion Quirk (DE Bar 4136), *pro hac vice*
7 Director of Consumer Protection
8 Ryan Costa (DE Bar 5325), *pro hac vice*
9 Deputy Director of Consumer Protection
10 Delaware Department of Justice
11 820 N. French Street, 5th Floor
12 Wilmington, DE 19801
13 Phone: (302) 683-8811
14 Marion.Quirk@delaware.gov
15 Ryan.Costa@delaware.gov

16 *Attorneys for Plaintiff State of Delaware*

17 **ANNE E. LOPEZ**
18 Attorney General
19 State of Hawai‘i

20 */s/ Douglas S. Chin*
21 Christopher J.I. Leong (HI JD No. 9662), *pro hac vice*
22 Supervising Deputy Attorney General
23 Kelcie K. Nagata (HI JD No. 10649), *pro hac vice*
24 Deputy Attorney General
25 Department of the Attorney General
26 Commerce and Economic Development Division
27 425 Queen Street
28 Honolulu, Hawai‘i 96813
 Phone: (808) 586-1180
 Christopher.ji.leong@hawaii.gov
 Kelcie.k.nagata@hawaii.gov
 Douglas S. Chin (HI JD No. 6465), *pro hac vice*
 John W. Kelly (HI JD No. 9907), *pro hac vice*
 Special Deputy Attorney General
 Starn O’Toole Marcus & Fisher
 733 Bishop Street, Suite 1900
 Honolulu, Hawai‘i 96813
 Phone: (808) 537-6100
 dchin@starnlaw.com

1 Matthew.Davies@ilag.gov
2 Daniel.Roth@ilag.gov
3 Meera.Khan@ilag.gov

4 *Attorneys for Plaintiff the People of the State of*
5 *Illinois*

6 **THEODORE E. ROKITA**

7 Attorney General
8 State of Indiana

9 */s/ Scott L. Barnhart*

10 Scott L. Barnhart (IN Atty No. 25474-82)
11 *pro hac vice*
12 Chief Counsel and Director of Consumer
13 Protection Corinne Gilchrist (IN Atty No. 27115-
14 53)
15 *pro hac vice*
16 Section Chief, Consumer Litigation
17 Mark M. Snodgrass (IN Atty No. 29495-49)
18 *pro hac vice*
19 Deputy Attorney General
20 Office of the Indiana Attorney General
21 Indiana Government Center South
22 302 West Washington St., 5th Floor
23 Indianapolis, IN 46203
24 Telephone: (317) 232-6309
25 Scott.Barnhart@atg.in.gov
26 Corinne.Gilchrist@atg.in.gov
27 Mark.Snodgrass@atg.in.gov

28 *Attorneys for Plaintiff State of Indiana*

22 **KRIS W. KOBACH**

23 Attorney General
24 State of Kansas

25 */s/ Sarah Dietz*

26 Sarah Dietz, Assistant Attorney General
27 (KS Bar No. 27457), *pro hac vice*
28 Office of the Kansas Attorney General
 120 SW 10th Avenue, 2nd Floor
 Topeka, Kansas 66612
 Telephone: (785) 296-3751
 sarah.dietz@ag.ks.gov

Baton Rouge, LA 70802
Tel: (225) 326-6435
NachabeA@ag.louisiana.gov
Attorney for State of Louisiana

AARON M. FREY
Attorney General
State of Maine

/s/ Michael Devine
Michael Devine (Maine Bar No. 5048),
pro hac vice
Assistant Attorney General
Office of the Maine Attorney General
6 State House Station
Augusta, ME 04333-0006
(207) 626-8829
michael.devine@maine.gov
Attorney for Plaintiff State of Maine

ANTHONY G. BROWN
Attorney General
State of Maryland

/s/ Elizabeth J. Stern
Philip D. Ziperman (Maryland CPF No.
9012190379), *pro hac vice*
Deputy Chief, Consumer Protection Division
Elizabeth J. Stern (Maryland CPF No.
1112090003), *pro hac vice*
Assistant Attorney General
Office of the Attorney General of Maryland
200 St. Paul Place
Baltimore, MD 21202
Phone: (410) 576-6417 (Mr. Ziperman)
Phone: (410) 576-7226 (Ms. Stern)
Fax: (410) 576-6566
pziperman@oag.state.md.us
estern@oag.state.md.us

*Attorneys for Plaintiff Office of the Attorney
General of Maryland*

KEITH ELLISON
Attorney General

1 State of Minnesota
2

3 */s/ Caitlin Micko*
4 Caitlin Micko (MN Bar No. 0395388)
5 Assistant Attorney General
6 Office of the Minnesota Attorney General
7 445 Minnesota Street, Suite 600
8 St. Paul, MN 55101
9 Tel: (651) 724-9180
10 Caitlin.micko@ag.state.mn.us
11

12 *Attorney for State of Minnesota, by its*
13 *Attorney General, Keith Ellison*
14

15 **MICHAEL T. HILGERS**
16 Attorney General
17 State of Nebraska
18

19 */s/ Anna M. Anderson*
20 Anna M. Anderson (NE #28080)
21 Assistant Attorney General
22 *pro hac vice*
23 Benjamin J. Swanson (NE #27675)
24 Assistant Attorney General
25 Nebraska Attorney General's Office
26 1445 K Street, Room 2115
27 Lincoln, NE 68509
28 (402) 471-6034
29 anna.anderson@nebraska.gov
30 benjamin.swanson@nebraska.gov
31

32 *Attorneys for Plaintiff State of Nebraska*
33

34 **MATTHEW J. PLATKIN**
35 Attorney General
36 State of New Jersey
37

38 By: */s/ Kashif T. Chand*
39 Kashif T. Chand (NJ Bar No. 016752008),
40 *Pro hac vice*
41 Assistant Attorney General
42 Thomas Huynh (NJ Bar No. 200942017),
43 *Pro hac vice*
44 Assistant Section Chief, Deputy Attorney
45 General
46

1 Verna J. Pradaxay (NJ Bar No. 335822021),
 2 *Pro hac vice*
 3 Mandy K. Wang (NJ Bar No. 373452021),
 4 *Pro hac vice*
 5 Deputy Attorneys General
 6 New Jersey Office of the Attorney General,
 7 Division of Law
 8 124 Halsey Street, 5th Floor
 9 Newark, NJ 07101
 Tel: (973) 648-2052
 Kashif.Chand@law.njoag.gov
 Thomas.Huynh@law.njoag.gov
 Verna.Pradaxay@law.njoag.gov
 Mandy.Wang@law.njoag.gov

10 *Attorneys for Plaintiffs Matthew J. Platkin,*
 11 *Attorney General for the State of New Jersey, and*
 12 *Elizabeth Harris, Acting Director of the New*
Jersey Division of Consumer Affairs

13 **LETITIA JAMES**
 14 Attorney General
 15 State of New York

16 /s/ Nathaniel Kosslyn
 17 Nathaniel Kosslyn, Assistant Attorney General
 18 (NY Bar No. 5773676), *pro hac vice*
 nathaniel.kosslyn@ag.ny.gov
 19 Alex Finkelstein, Assistant Attorney General
 20 (NY Bar No. 5609623), *pro hac vice*
 alex.finkelstein@ag.ny.gov
 21 New York Office of the Attorney General
 22 28 Liberty Street
 23 New York, NY 10005
 (212) 416-8000

24 **JEFF JACKSON**
 25 Attorney General
 26 State of North Carolina

27 /s/ Charles White
 28 Charles G. White (N.C. State Bar No. 57735), *pro*
hac vice
 Assistant Attorney General

1 Kunal Choksi
 2 Senior Deputy Attorney General
 3 Josh Abram
 4 Special Deputy Attorney General
 5 N.C. Department of Justice
 6 Post Office Box 629
 7 Raleigh, North Carolina 27602
 Telephone: (919) 716-6006
 Facsimile: (919) 716-6050
 E-mail: cwhite@ncdoj.gov
Attorneys for Plaintiff State of North Carolina

8
DAVE YOST
 9 OHIO ATTORNEY GENERAL

10 */s/ Kevin R. Walsh*
 11 Melissa G. Wright (0077843)
 12 Section Chief, Consumer Protection Section
 13 Melissa.Wright@ohioago.gov
 14 Melissa S. Smith (0083551)
 15 Asst. Section Chief, Consumer Protection Section
 16 Melissa.S.Smith@ohioago.gov
 17 Michael S. Ziegler (0042206)
 18 Principal Assistant Attorney General
 19 Michael.Ziegler@ohioago.gov
 20 Kevin R. Walsh (0073999)
 21 Senior Assistant Attorney General
 22 Kevin.Walsh@ohioago.gov
 23 30 East Broad Street, 14th Floor
 24 Columbus, Ohio 43215
 25 614-466-1031

26 **DAN RAYFIELD**
 27 Attorney General
 28 State of Oregon

29 */s/ John Dunbar*
 30 John J. Dunbar (Oregon Bar No. 842100)
 31 Assistant Attorney General
 32 Oregon Department of Justice
 33 100 SW Market Street
 34 Portland, Oregon 97201
 Telephone: (971) 673-1880
 Facsimile: (971) 673-1884
 E-mail: john.dunbar@doj.oregon.gov

1
2 *Attorneys for State of Oregon ex rel.*
3 *Dan Rayfield, Attorney General*

4
5 **DAVID W. SUNDAY, JR.**
6 Attorney General
7 Commonwealth of Pennsylvania

8
9
10 */s/ Jonathan R. Burns*
11 Jonathan R. Burns
12 Senior Deputy Attorney General
13 (PA Bar No. 315206), *pro hac vice*
14 Pennsylvania Office of Attorney General
15 Strawberry Square, 14th Floor
16 Harrisburg, PA 17120
17 717.787.3391
18 jburns@attorneygeneral.gov

19
20 *Attorneys for Plaintiff the Commonwealth of*
21 *Pennsylvania*

22
23 **PETER F. NERONHA**
24 Attorney General
25 State of Rhode Island

26
27 */s/ Stephen N. Provazza*
28 Stephen N. Provazza (R.I. Bar No. 10435),
29 *pro hac vice*
30 Assistant Attorney General
31 Rhode Island Office of the Attorney General
32 150 South Main St.
33 Providence, RI 02903
34 Phone: 401-274-4400
35 Email: SProvazza@riag.ri.gov

36
37 *Attorneys for Plaintiff State of Rhode Island*

38
39 **ALAN WILSON**
40 Attorney General
41 State of South Carolina

42
43 */s/ Anna C. Smith*
44 C. Havird Jones, Jr.
45 Senior Assistant Deputy Attorney General
46 Jared Q. Libet (S.C. Bar No. 74975),

pro hac vice
Assistant Deputy Attorney General
Anna C. Smith (SC Bar No. 104749),
pro hac vice
Assistant Attorney General
Office of the South Carolina Attorney General
Post Office Box 11549
Columbia, South Carolina 29211
jlibet@scag.gov
annasmith@scag.gov
803-734-0536

*Attorneys for Plaintiff the State of South Carolina,
ex rel. Alan M. Wilson, in His Official Capacity as
Attorney General of the State of South Carolina*

MARTY J. JACKLEY
Attorney General
State of South Dakota

/s/ Amanda Miiller
By: Amanda Miiller (SD Bar No. 4271)
Deputy Attorney General
1302 East SD Hwy 1889, Suite 1
Pierre, SD 57501-8501
Telephone: (605) 773-3215
Amanda.Miiller@state.sd.us

Attorneys for Plaintiff State of South Dakota

JASON S. MIYARES
Attorney General
Commonwealth Of Virginia

/s/ Joelle E. Gotwals
Steven G. Popps
Chief Deputy Attorney General
Thomas J. Sanford
Deputy Attorney General
Richard S. Schweiker, Jr.
Senior Assistant Attorney General and Section
Chief
Joelle E. Gotwals (VSB No. 76779),
Senior Assistant Attorney General
pro hac vice

1 Chandler P. Crenshaw (VSB No. 93452)
2 Assistant Attorney General
3 *pro hac vice*
4 Office of the Attorney General of Virginia
5 Consumer Protection Section
6 202 N. 9th Street
7 Richmond, Virginia 23219
8 Telephone: (804) 786-8789
9 Facsimile: (804) 786-0122
10 E-mail: jgotwals@oag.state.va.us

11
12 *Attorneys for the Plaintiff Commonwealth of*
13 *Virginia*
14 *ex rel. Jason S. Miyares, Attorney General*

15 **NICHOLAS W. BROWN**
16 Attorney General State of Washington

17 /s/ Claire McNamara
18 Claire McNamara (WA Bar No. 50097)
19 Gardner Reed (WA Bar No. 55630)
20 Assistant Attorneys General
21 Washington State Office of the Attorney General
22 800 Fifth Avenue, Suite 2000
23 Seattle, WA 98104
24 (206) 340-6783
25 claire.mcnamara@atg.wa.gov
26 gardner.reed@atg.wa.gov

27
28 *Attorneys for Plaintiff State of Washington*

29 **JOHN B. MCCUSKEY**
30 Attorney General
31 State of West Virginia

32
33 /s/ Laurel K. Lackey
34 Laurel K. Lackey (WVSB No. 10267)
35 Abby G. Cunningham (WVSB No. 13388)
36 Assistant Attorneys General
37 Office of the Attorney General
38 Consumer Protection & Antitrust Division
39 Eastern Panhandle Office
40 269 Aikens Center
41 Martinsburg, West Virginia 25404

1 Telephone: (304) 267-0239
2 Email: laurel.k.lackey@wvago.gov
3 abby.g.cunningham@wvago.gov

4 *Attorneys for Plaintiff State of West Virginia, ex
rel. John B. McCuskey, Attorney General*

5 **JOSHUA L. KAUL**
6 Attorney General
7 State of Wisconsin

8 */s/ Brittany Copper*
9 Brittany A. Copper
Assistant Attorney General
WI State Bar # 1142446
10 Wisconsin Department of Justice
Post Office Box 7857
11 Madison, Wisconsin 53707-7857
(608) 266-1795
12 Brittany.copper@wisdoj.gov

13
14 *Attorneys for Plaintiff State of Wisconsin*

15
16
17
18
19
20
21
22
23
24
25
26
27
28

ATTESTATION

I, Andre M. Mura, hereby attest, pursuant to N.D. Cal. Civil L.R. 5-1, that the concurrence to the filing of this document has been obtained from each signatory hereto.

DATED: November 7, 2025

/s/ Andre M. Mura

GIBBS MURA LLP

1111 Broadway, Suite 2100

Oakland, CA 94607

Telephone: (510) 350-9700

Facsimile: (510) 350-9701

amm@classlawgroup.com

○ 一

1 **CERTIFICATE OF SERVICE**

2 The undersigned hereby certifies that a copy of the foregoing and its attachments was
3 served via electronic mail on November 7, 2025, to Counsel for Defendants using the email
4 addresses designated by counsel for that purpose:

5 MetaNoticeofService@cov.com

6 SnapNoticeofService@mto.com

7 TikTokNoticeofService@faegredrinker.com

8 SERVICE-YOUTUBE-INRESOCIALMEDIAM@LIST.WSGR.COM

9 mdl3047coleadfirms@listserv.motleyrice.com

10 pscservicemd13047@motleyrice.com

11 I declare under penalty of perjury of the laws of the United States that the foregoing is true
12 and correct.

13 _____
14 */s/ Honeyleen Bohol* _____
15 Honeyleen Bohol

16
17
18
19
20
21
22
23
24
25
26
27
28